

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KING COUNTY, et al.,

Plaintiffs,

vs.

SCOTT TURNER in his official capacity as  
Secretary of the U.S. Department of Housing and  
Urban Development, et al.,

Defendants.

Case No. 2:25-cv-00814-BJR

**DECLARATION OF INGRID MEZQUITA**

I, Ingrid Mezquita, declare as follows:

1. I am a resident of the State of California. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to the matters set forth below.

2. I am the Executive Director of the San Francisco Department of Early Childhood (DEC). DEC is the result of a merger of two existing city departments, First 5 and the Office of Early Care and Education (OECE). Both First 5 and OECE have long histories of supporting young children and families in San Francisco through innovations in early care and education, family support services, and programs to support children's healthy development. In 2022, they merged to expand their capacity and funding and to better integrate the City's early childhood services. I have served as the Executive Director of DEC since its creation. Prior to that, I served as the Director of OECE and the Executive Director of First 5.

3. DEC expects to receive approximately \$5 million in discretionary and non-discretionary grants from the HHS Administration for Children and Families during their current terms to support access to childcare for San Francisco children and families.

4. For example, DEC receives nearly half a million dollars through the "Alternative Payment Program" to pay for childcare for approximately 200 children from low-income families. DEC also receives approximately \$1.4 million in "CalWORKS Stage 2 Program" funds to provide

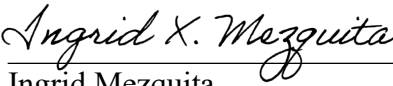
1 access to childcare for approximately 700 children whose parents are receiving workforce support  
2 through San Francisco's CalWORKs program. And DEC receives over \$3 million to provide educator  
3 stipends, training, and other support to raise the quality of classroom care and instruction at childcare  
4 centers that serve subsidized families. All of these funds are critical to support low-income children  
5 and their families in San Francisco.

6 5. Children's earliest experiences shape the trajectories of their lives. Supporting  
7 children's physical, social-emotional, and cognitive development needs—prenatally and during their  
8 first five years—is what builds a strong foundation for success in school and in life. Responsive, age-  
9 appropriate opportunities for play and learning, optimum early learning environments, family well-  
10 being, and access to quality health and mental health care—all these factors contribute to positive  
11 child outcomes. Public investment in our youngest learners and their families is crucial to ensuring a  
12 bright future for all of us.

13 6. In addition, childcare is critical for families to attend work and/or educational or  
14 vocational programs. But childcare in San Francisco is expensive. Forty-two percent of San  
15 Francisco families surveyed in a Family Survey Conducted by the San Francisco Controller's Office  
16 (2018), reported that the cost of early education was the most significant challenge families face.

17 7. DEC is already under tremendous budgetary pressure and has limited ability to make up  
18 the loss of this funding.

19 I declare under penalty of perjury that the foregoing is true and correct and that this declaration  
20 was executed on July 8, 2025 at San Francisco, California.

21  
22   
23 Ingrid Mezquita

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2025, I served a true and correct copy of the foregoing document on the following parties by the method(s) indicated below:

Brian C. Kipnis Annalisa L. Cravens Sarah L. Bishop Rebecca S. Cohen <i>Assistant United States Attorneys</i> Office of the United States Attorney 700 Stewart Street, Suite 5220 Seattle, WA 98101-1271 brian.kipnis@usdoj.gov annalisa.cravens@usdoj.gov sarah.bishop@usdoj.gov rebecca.cohen@usdoj.gov  <i>Attorneys for Defendants</i>	<input checked="" type="checkbox"/> CM/ECF E-service <input type="checkbox"/> Email <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Certified Mail / Return Receipt Requested <input type="checkbox"/> Hand delivery / Personal service
---	---

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

DATED this 14<sup>th</sup> day of July, 2025.

/s/ Gabriela DeGregorio

Gabriela DeGregorio  
 Litigation Assistant  
 Pacifica Law Group LLP